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September 1, 2020

Via ECF
Hon. Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
Courtroom 619
New York, NY 10007

The September 2 conference is adjourned to September 16, 2020 at 10:30 AM. At the time of the conference, the parties should call the Court using the following dial-in information: (877)411-9748; Access Code (3029857#).

SO ORDERED.

Edgardo Ramos, U.S.D.J
Dated: September 1, 2020
New York, New York

Re: Jeffrey Kolton, individually and derivatively as a Member of Corlex Capital, LLC, v. Jason Bedasse, Case No. 1:20-cv-06623-ER: Letter Motion Seeking Adjournment of Court Appearance

Dear Honorable Judge Ramos:

We represent Plaintiffs, Jeffrey Kolton individually and derivatively on behalf of Corlex Capital, LLC, in the above-referenced case. We write to request an adjournment of the pre-motion conference scheduled for tomorrow, which request is made jointly with Defendant Jason Bedasse.

Pursuant to Your Honor's Individual Rule 1(E), the scheduled date of the appearance is September 2, 2020, no prior adjournments have been requested, and all parties consent to this request. The reason for the requested adjournment is that the parties have had productive discussions regarding resolution of this lawsuit. The parties entered a "Standstill Agreement" today which essentially agrees to a cease-fire while those discussions continue.

The parties request that tomorrow's conference concerning Defendant's pre-motion letter for an anticipated motion to dismiss ([ECF Dkt # 8](#)) be adjourned until September 15, 2020 or another date and time convenient for the Court. The parties also jointly request that any appearance or briefing schedule on Plaintiffs' motion seeking a temporary restraining order ([ECF Dkt # 6](#)) not be scheduled at this time.

This requested adjournment will not affect any other dates as this case is in its relative infancy and no Initial Conference has been held.

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September 1, 2020
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All parties thank the Court for its indulgence and attention to this matter.

Respectfully Submitted,

/s/ Joshua Krakowsky
Joshua Krakowsky

cc: Leron E. Rogers, Esq. (via email and ECF)
Brian Pete, Esq. (via email and ECF)
Larry Hutcher, Esq. (via email and ECF)